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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

JANE DOE NOS. 1 - 22, inclusive, individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business organization, form unknown; MICHAEL J. PRATT, an individual; ANDRE GARCIA, an individual; MATTHEW WOLFE, an individual; BLL MEDIA, INC., a California corporation; BLL MEDIA HOLDINGS, LLC, a Nevada limited liability company; DOMI PUBLICATIONS, LLC, a Nevada limited liability company; EG PUBLICATIONS, INC., a California corporation; M1M MEDIA, LLC, a California limited liability company; BUBBLEGUM FILMS, INC., a business organization, form unknown; OH WELL MEDIA LIMITED, a business organization, form unknown; MERRO MEDIA, INC., a California corporation; MERRO MEDIA HOLDINGS, LLC, a Nevada limited liability company; and ROES 1 - 550, inclusive,

Defendants.

LEAD CASE:

Case No.: 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:

Case No.: 37-2017-00033321-CU-FR-CTL

Case No.: 37-2017-00043712-CU-FR-CTL

DECLARATION OF PLAINTIFF JANE DOE NO. 3 IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT DOMI PUBLICATION LLC'S SPECIAL MOTION TO STRIKE [CCP §425.16]

Date: August 31, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Location: C-73

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3 I, Jane Doe No. 3, declare as follows:

- 4 1. I am a plaintiff in the above-captioned action. I have personal knowledge of each fact stated in
5 this declaration.
6 2. In March 2014, Defendants contacted me on ExploreTalent.com, seeking young women for
7 modeling. I eventually responded and corresponded with defendant Andre Garcia ("GARCIA")
8 (then going by his alias "Jonathan"). Our initial conversions were via text and/or email -- the
9 following representations regarding distribution were conveniently by phone or in-person.
10 3. GARCIA told me that Defendants would not post the subject video online and they would not
11 distribute the video in the United States. GARCIA told me the video would go overseas to
12 South America - and would only be in DVD format.
13 4. Before the shoot, GARCIA and defendant Matthew Wolfe ("WOLFE") (going by his alias
14 "Ben"), again, assured me they would not post the video online and they would not distribute
15 the video in the United States. They assured me there was nothing to worry about, promised me
16 privacy, and represented nobody I knew would see the videos.
17 5. WOLFE and GARCIA continued to make the above representations before and simultaneous
18 with providing me documents to sign. They also told the documents were merely to ensure my
19 privacy and that I would be compensated.
20 6. In July 2014, Defendants released my video on their website, www.girlsdoporn.com, and other
21 websites, which were then discovered by my friends, coworkers, employer, and my family.
22 7. As a result of the release of the video, I have suffered emotional distress damages (including
23 loss of eating, loss of sleep, enduring fright, shock, nervousness, anxiety, depression,
24 embarrassment, mortification, shame, and fear):
25 a. I have suffered on an almost daily basis.
26 b. I have had to tell boyfriends, which has resulted in breakups and pain.
27 c. I was shunned by friends and coworkers.
28

- d. I have been harassed on social media – to the point where I had to change usernames and block strangers.
- e. A former friend blackmailed me after finding the video, suggesting he would further spread the video, unless I had sex with him.
- f. I was so humiliated at work that I had to leave my job. I am also terrified that any current or future employers/coworkers will discover the video.
- g. I am also terrified that I will not be admitted into future colleges, to which I am now applying.
- h. I have gone through hours of therapy.
- i. I have had to speak with family about this, which has caused me shame and humiliation.
- j. This incident has denigrated by confidence and well-being. I have intermittent anxiety and social issues. I am paranoid and afraid of people discovering the video and thus I distance myself from others.

8. I would never have agreed to the video, if Defendants had been truthful, told me their plan to release my video on their website, or told me I was in danger. I would never have agreed to the video, if Defendants had told me their website existed. I made a mistake trusting the Defendants – they are not truthful people.

9. Before and during this lawsuit, I made changes to my life to minimize the harassment and other damages the Defendants have caused me. In this lawsuit, I seek the Court's help in remedying the-damages the Defendants have caused me. Unsealing the Court record will likely cause me even more harm and the harassment may exacerbate and/or resurface. Unsealing the Court record will worsen the very harm I have am seeking to now remedy.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: March 7, 2017

Dec. Signed by
By: Jane Doe No. 3
Jane Doe No. 3